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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

WESTERN ORGANIZATION OF
RESOURCE COUNCILS, *et al.*,

Plaintiffs,

v.

UNITED STATES BUREAU OF
LAND MANAGEMENT,

Defendant.

Case No. 4:20-cv-76-BMM-JTJ

**STATE OF WYOMING'S
[PROPOSED] ANSWER**

Pursuant to Federal Rule Civil Procedure 24(c), the State of Wyoming (Wyoming) submits this Answer to the Complaint filed by Plaintiffs and asserts affirmative defenses as follows:

1. Wyoming admits the allegations in the following: the first and second sentence of Paragraph 1; Paragraph 7; Paragraph 8; Paragraph 11; the first through fifth sentences of Paragraph 13; Paragraph 14; Paragraph 25; Paragraph 26; Paragraph 27; Paragraph 28; and the first sentence of Paragraph 29.

2. Wyoming denies the allegations in the following: Paragraph 3; Paragraph 4; Paragraph 5; Paragraph 9; Paragraph 10; the sixth sentence of Paragraph 13; Paragraph 24; and the second and third sentence of Paragraph 29.

3. The allegations in the following purport to characterize Plaintiffs' case or are conclusions of law: the third sentence of Paragraph 1; Paragraph 23; Paragraph 31; Paragraph 32; Paragraph 33; Paragraph 34; Paragraph 35; Paragraph 36; Paragraph 38; Paragraph 39; Paragraph 40; Paragraph 41; Paragraph 43; Paragraph 44; Paragraph 45; Paragraph 46; Paragraph 47; and Paragraph 48 and therefore, no response is required. To the extent a response is required, Wyoming denies the allegations.

4. The allegations in the following purport to characterize a document or contents of a document that speaks for itself and is therefore the best evidence of its contents: Paragraph 2; and Paragraph 30 and therefore, no response is required. To the extent a response is required, Wyoming denies the allegations.

5. Wyoming is without knowledge or information sufficient to form a belief as to the truth of the allegations in the following: Paragraph 6; Paragraph 12;

Paragraphs 15 through Paragraph 22. To the extent a response is required, Wyoming denies the allegations.

6. The allegations in Paragraphs 37 and 42 incorporate by reference previously-stated allegations, therefore no response is required. To the extent that a response is required, Wyoming denies the allegations.

7. Wyoming denies each and every allegation in the Complaint which has not been specifically admitted herein.

8. Wyoming denies that Plaintiffs are entitled to the relief requested in Paragraphs A, B, C, D, E, and F.

AFFIRMATIVE DEFENSES

1. Plaintiffs fail to state a claim upon which relief can be granted.

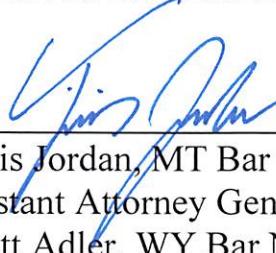
2. The District of Montana is not a convenient venue for reviewing the Buffalo RMP Amendment, and it should be transferred to the District of Wyoming pursuant to 28 U.S.C. § 1404.

3. Wyoming reserves the right to assert additional affirmative defenses that may be discovered after the filing of this Answer.

WHEREFORE, the State of Wyoming requests that Plaintiffs' Complaint be dismissed with prejudice, that it be awarded its costs incurred herein, and for such other and further relief as this Court deems just and proper.

Dated this 30th day of September, 2020.

FOR PROPOSED DEFENDANT-
INTERVENOR STATE OF WYOMING


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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of September, 2020, a true copy of the foregoing was served by United States mail, first class, postage prepaid, to the following:

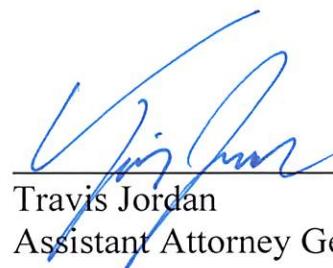
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